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**United States Patent And Trademark Office**  
**COMMISSIONER FOR PATENTS**  
**Attn: Aaron J Sanders and Christian Chace, Examiner and Supervisor**  
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**Alexandria, Virginia 22313-1450**

February 10, 2007

Gentlemen,

Ref. Your Notice Regarding A Non-Compliant Amendment mailed on 01/18/2007, Application No. 10/710,299

Main concerns in your non-final rejection have been addressed in our amendment sent on 12-10-2006. I would like to make additional remarks by citing the Specification in the original application.

**1. Data instance** regarding original claims 4, 11, 12.

Following paragraphs in the Specification cover the concept of data instance: 0036, 0039, 0041, 0043, 0063, 0070. Sections 0063 and 0070 relate the data instance concept in object databases to a row or tuple in relational databases.

**2. XPath** regarding original claim 3.

Paragraphs 0023-0037 cover mapping between logical data and physical file system structure. XPath to cover navigation inside a nested XML file is not involved in the invention at all. The invention is about navigating among groups of XML files. Each XML data file in the invention is of a flat structure, which entails no XPath technology.

**3. DOM API** regarding original claims 6, 16.

The dynamic API in this invention builds on top of DOM API. Java code disclosure in the Program Listing Deposit shows how this invention wraps DOM API calls:

- private String getFromStorage(String name)
- private static void add(String name,  
Set set,  
Document document)
- private static Set getList(String name, Document document)
- private static void saveSingle(String name,  
String value,  
Document document)
- private static Document getDocument(File file)
- private static void saveRemoval(String name,  
Set set,  
Document document)

In the currently-amended claims 2, 5, and 8, formal terms 'accessor' and 'mutator' are used. 'accessor' is for the 'Get' operation, 'mutator' for 'Set' operation covered in Paragraph 0065.

Sincerely,  
/Hongyu Wu/

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Hongyu Wu, EVP  
gMorpher Inc.